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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

§ Case No. 25-80078-SWE

HOOTERS OF AMERICA, LLC,

§ Chapter 11

Debtor.

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§

§

**[UNOPPOSED] MOTION OF STORE MASTER FUNDING II, LLC AND ARC
CAFEUSA001, LLC TO WAIVE THE LOCAL COUNSEL REQUIREMENT OF LOCAL
RULE 2090-4**

TO THE HONORABLE SCOTT W. EVERETT, UNITED STATES BANKRUPTCY JUDGE:

STORE Master Funding II, LLC and ARC CafeUSA001, LLC (collectively, the “Landlords”) request that the Court waive the local counsel requirement for these reasons:

1. On March 31, 2025, Debtor filed a voluntary petition for relief under Chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) with this Court.
2. The Landlords are the Debtor’s landlords under numerous leases related to seven locations.
3. The Local Rules for the United States Bankruptcy Court for the Northern District of Texas (the “Local Rules”) require an attorney appearing in a case in the district to retain local counsel if that attorney does not reside or maintain an office within 50 miles of the Northern District of Texas Federal District Court and Bankruptcy Court.

4. Local Rule 2090-4(a) provides that counsel may seek leave of the court to proceed without local counsel.

5. The undersigned attorney, Craig Solomon Ganz, is admitted to practice and is a member in good standing of the Texas State Bar (No. 24127203). Mr. Ganz is also admitted to practice in the United States District Courts for the Northern District of Texas and the Southern District of Texas.

6. Joel F. Newell is admitted to practice and is a member in good standing of the Texas State Bar (No. 24137409). Mr. Newell is also admitted to practice in the United States District Courts for the Northern District of Texas, Southern District of Texas, Eastern District of Texas, and Western District of Texas.

7. However, Ballard Spahr LLP does not maintain an office within 50 miles of the Court.

8. Each of the foregoing attorneys have reviewed and are familiar with the local rules of this Court. They have appeared in the Northern District of Texas on numerous occasions over the last five (5) years as depicted in the chart below:

Attorney	Case No.	Case Title	Bankruptcy Chapter
Craig Ganz	3:2020bk31318	GGI Holdings, LLC	11
Craig Ganz	3:2020bk31476	Tuesday Morning Corporation	11
Craig Ganz	3:2020bk32633	Studio Movie Grill Holdings, LLC	11
Craig Ganz	8:2023bk80000	Sunland Medical Foundation	11
Craig Ganz	4:2023bk42511	ACM Fatz VII LLC	7
Craig Ganz	3:2025bk80069	Zips Car Wash, LLC et. al. ¹	11
Joel Newell	3:2023cr00454	USA v. Barroga et al - Desi Barroga	N/A
Joel Newell	3:2023cr00454	USA v. Barroga et al - Deno Barroga	N/A
Joel Newell	4:2024bk42483	Amergent Hospitality Group, Inc.	11
Joel Newell	3:2025bk80069	Zips Car Wash, LLC et. al. ¹	11

¹ Currently, Craig Solomon Ganz and Joel F. Newell are appearing as counsel in this matter without local counsel, pursuant to a court order waiving this requirement.

9. Landlords have discussed the foregoing with counsel for the Debtor, and Debtor is aware of and are unopposed to the relief request herein.

10. Should the Court require an in-person appearance, Mr. Ganz and/or Mr. Newell are able to travel on short notice to the Dallas area.

11. Landlords believe that Mr. Ganz and Mr. Newell can provide the services required of local counsel.

12. Landlords believe that good cause exists for waiver of the local counsel requirement.

13. If at any time the Court disagrees, the Landlords will retain local counsel.

14. A proposed form of Order is attached.

FOR THESE REASONS, Landlords respectfully request that the Court grant the [Unopposed] Motion to Waive the Local Counsel Requirement of Local Rule 2090-4 and enter the attached proposed Order granting such relief as is just.

DATED: April 4, 2025

Respectfully submitted,

By: /s/ Joel F. Newell

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CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2025, a true and correct copy of the above and foregoing was filed electronically, and notice was served via the court's CM/ECF system on all parties entering an appearance and requesting such notice in this case.

/s/ Joel F. Newell _____
Joel F. Newell, Esq.